

Comarch Group Contractor Analysis Policy

Version: 2.0

Valid from: 2025-07-28

Public document

1. Purpose and Scope

The Comarch Group, due to the global nature of its business, has a significant impact on the economic and social environment. The Contractor Analysis Policy ('Policy') is one of the fundamental elements of the organisation's strategy, reflecting its responsible approach to building business relationships.

The Policy has been approved for application by the Board of Directors of Comarch S.A. and its provisions apply to all employees, associates and representatives of the Comarch Group - both in Poland and abroad. If, however, local law in any jurisdiction requires that these provisions be modified or supplemented, local subsidiaries may modify the provisions of the Policy, provided that prior approval is obtained from the Compliance and Internal Audit Department of Comarch S.A.

The Comarch Group organises annual training courses for its employees performing work with a higher risk of sanctions, concerning sanctions regulations and the rules for verifying Comarch Group Contractors for their presence on national and international sanctions lists. Information on training attendance is recorded and stored in the Sanction Training Register, which the Compliance Team is responsible for maintaining.

2. Definitions

- **Contractor** – the natural person or legal entity entering into a relationship with the Comarch Group.
- **Supplier** – a business entity, including a subcontractor, providing goods or services to Comarch Capital Group companies.
- **Sanction List** – the official list of legal entities subject to prohibitions or restrictions in relation to breaches of the law or threats to security.

3. Key Principles of the Contractor Analysis Policy

The policy sets out the principles, responsibilities and standards in the process of analysing and assessing Contractors, with the aim of:

- ensuring cooperation with reliable business partners,
- minimising operational, legal and financial risks.

The policy covers all units involved in the selection and management of Contractor relationships, in particular:

- Compliance and Internal Audit Department,
- Logistics Department,
- ESG Department,
- Contractor Management Department,

- Quality Department,
- Tax and Financial Analysis Department,
- Integrated Management System Officer,
- Trading Control Officer.

4. Criteria for Contractor Analysis:

- **Financial credibility** - assessment of the Contractor's financial stability based on financial reports, credit ratings and opinions of financial institutions,
- **Legal compliance** - verification of the Contractor's compliance with applicable laws, including but not limited to tax, customs, anti-corruption and environmental regulations,
- **Sanctions Lists** - verification of the Contractor's compliance with international sanctions lists, in particular OFAC, EU, UN or national sanctions registers,
- **Ethical standards and corporate social responsibility (CSR)** - assessment of Suppliers' compliance with ethical principles, labour rights, human rights and environmental responsibility,
- **Quality of delivered products and services** - assessment of Supplier compliance with quality standards, certifications and meeting company expectations,
- **Logistical and operational capabilities** - analysis of Supplier's ability to deliver according to requirements in terms of timeliness, flexibility, security and reliability.

5. Related Procedures

The Contractor Analysis Policy is linked to the following procedures:

- Procedure for Registration and Verification of Contractors,
- Procedure for Analysis of Suppliers in the Comarch Group,
- Procedure for Analysis of Payment Capability of Contractors.

These documents set out detailed rules for the verification of Contractors, including:

- Supplier questionnaires,
- verification of Contractors in publicly available public registers, databases,
- monitoring of Sanction Lists,
- recommendation of financial collateral,
- analysis of Contractor's payment capacity.

6. Links to Other Comarch Policies

The Contractor Analysis Policy functions in close correlation with the:

- Comarch S.A. Integrated Management System Policy,
- Internal Control System Policy,
- Supplier Sustainability Policy.

7. Liability for Non-compliance

Non-compliance by employees, co-workers and representatives with the provisions of the Comarch Group Contractor Analysis Policy shall be treated as a breach of employee duties and may result in disciplinary consequences in accordance with applicable laws.

8. Sanctions List Monitoring Process

Comarch Group's response to the need for effective and reliable verification of business partners is cyclical monitoring of Contractors on Sanction Lists, including verification of both legal entities and ultimate beneficial owners (UBOs), ensuring comprehensive and reliable analysis of a wide group of stakeholders. The verification is also extended to new Contractors, allowing the risk of cooperation with entities subject to restrictions to be minimised on an ongoing basis.

In addition to the monitoring of Sanction Lists, Contractors are also checked on **Politically Exposed Persons lists (PEP)**, **Relatives and Close Associates lists (RCA)**, and Public **Warning Lists** published by the Komisja Nadzoru Finansowego (Financial Supervision Commission).

9. Organisational Responsibility

Tax and Financial Analysis Department

- assessment of tax and financial risks,
- opinion on draft agreements,
- analysis of Contractors' reliability.

Contractor Management Department

- verification of Contractor data in public registers,
- data updating and document archiving.

Sanction Officer in the Compliance and Internal Audit Department

In order to ensure that the organisation's activities comply with applicable national and international sanctions laws, a Sanctions Officer has been appointed within the Comarch Group. The appointment of the Sanctions Officer is part of the compliance system and an expression of the Group's commitment to building a culture of compliance and regulatory responsibility. His task is to:

- monitoring the process of assessing Contractors for verification of Sanctions Lists,
- supporting actions to minimise the risk of sanctions violations.